

IN THE UNITED STATE DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

FILED

NOV 07 2016

CHAD WILLIAM REED,
 plaintiff,

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY ewm, DEPUTY

v.

Case NO: CIV-16-461-C

JASON BRYANT, et al.
 Defendants.

MOTION FOR EXTENSION

Comes NOW Plaintiff, Chad William Reed, Pro Se, with a Request for Extension of time to file plaintiff's objection to Motion to Dismiss filed by the Defendants on 10-19-2016 [Document 28]. To support this Motion Plaintiff states the following.

1. Plaintiff needs more time to obtain additional affidavits to counter and contest the facts the defendants are disputing and alledging.
2. Plaintiff is only allowed 6 hrs a week of law library time

to research case law at this time and was limited to 2 hours and 45 minutes a week before that. See Exhibit 1 and 2. Attached. Because plaintiff lives on Unit 2.

3. Plaintiff also alleges that the Defendant Jason Bryant had the yard locked down for 60 days straight without any law library movement at all prior to September 2016.

4. The Defendants Received a 60 day extension to file their Martinez report and plaintiff did NOT object.

5. This Motion for extension of time will not in any way prejudice the defendants.

Therefore for the reasons stated above plaintiff Request a additional 45 days to file his Motion to Defendants Motion to Dismiss. Plaintiff's objection is Due on November 9th 2016. With a additional 45 days asked for, this Plaintiff's Response will be due by December 24, 2016.

Plaintiff therefore prays for the above Relief.

Respectfully Submitted
Chad William Reed
Chad William Reed #584428
James Crabtree Correctional Center
216 N. Murray St
Helena OK 73741

I declare or state under penalty of perjury that the foregoing is true and correct and that this motion for Extension of time was placed in the prison mailing system on November 2nd, 2016

Executed (signed) on November 2nd, 2016.

s. Chad William Reed
Chad William Reed #584428

Plaintiff is therefore exercising the prisoner mail box Rule.

Certificate of Service

I hereby certify that on the 2nd day of November 2016 I Mailed a true and correct copy of the foregoing attached document, Motion for Extension of time with 2 exhibits to the following:

Defendants Attorney
John D Hadden
Assistant Attorney General
Oklahoma Attorney Generals office
Litigation Division
313 NE 21st Street
Oklahoma City, OK 73105

office of the Clerk
United States District Court
Western District of Oklahoma
200 N.W 4th Street
Oklahoma City, Oklahoma 73102

postage prepaid by U.S. postal service.

s. Chad William Reed